

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WALTERS, et al.

Case No. 5:17-CV-10164

Plaintiffs,

Honorable Judith E. Levy

v.

THE CITY OF FLINT, et al.

Defendants.

This filing relates to:

AASIYAH MEEKS, et al.,

Case No. 5:19-CV-13359

Plaintiffs,

Honorable Judith E. Levy

v.

UNITED STATES OF AMERICA,

Defendant.

This filing relates to:

In re FTCA Flint Water Cases

Case No. 4:17-CV-11218
(Consolidated)

Honorable Linda V. Parker

NOTICE OF MOTION TO CONSOLIDATE

Pursuant to Local Rule 42.1(a)(2), the *Walters* plaintiffs hereby provide Notice of their Motion to Consolidate, pursuant to Federal Rule of Civil Procedure 42(a), *Meeks v. United States of America*, 5:19-cv-13359, currently pending before the Honorable Judith E. Levy, the

consolidated *In re FTCA Flint Water Cases*, 4:17-cv-11218, pending before Judge Linda V. Parker, with *Walters v. The City of Flint*, 5:17-cv-10164, currently pending before Judge Levy.

Pursuant to Local Rule 42.1(a)(1), the *Walters* Plaintiffs filed their motion to consolidate in *Walters v. The City of Flint*, 5:17-cv-10164. A copy of the filed motion to consolidate is appended hereto as Attachment 1.

Pursuant to Local Rule 7.1(a), counsel for the *Walters* Plaintiffs conferred with counsel for the United States, as well as with Plaintiffs' counsel for each of the consolidated FTCA cases regarding this motion. Counsel for the United States indicated their opposition to the motion.¹ Counsel for the *Burgess* Plaintiffs indicated they do not concur² and in fact object³ to the relief requested. Counsel for the *Anderson* Plaintiffs indicated their opposition the motion.⁴ Counsel for the *Thomas, Adams, Abraham* and *Berry* Plaintiffs did not take a position regarding the relief requested.⁵

Dated: January 17, 2020

Respectfully Submitted,

LEVY KONIGSBERG, LLP

/s/ COREY M. STERN
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¹ Attorney Eric A. Ray respectfully communicated this to me on behalf of the United States.

² Attorney Michael Pitt respectfully communicated this to me on behalf of the *Burgess* Plaintiffs.

³ Attorney Theodore Leopold communicated this to me, also on behalf of the *Burgess* Plaintiffs.

⁴ Attorney Valdemar Washington respectfully communicated this to me on behalf of the *Anderson* Plaintiffs.

⁵ Attorneys from Napoli Shkolnik, PLLC represent the *Thomas, Adams, Abraham* and *Berry* Plaintiffs.

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2020, the foregoing document was filed via the U.S. District Court's CM/ECF electronic system and a copy thereof was served upon all counsel of record.

LEVY KONIGSBERG, LLP

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